

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN PRODUCTS
LIABILITY LITIGATION,

MDL NO. 2875

THIS DOCUMENT RELATES TO:

HON. ROBERT B. KUGLER
DISTRICT JUDGE

Lana Dufrene

HON. JOEL SCHNEIDER
MAGISTRATE JUDGE

**NOTICE OF VIDEOTAPED DEPOSITION OF
PLAINTIFF NELLIE DAWSON**

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order #20, filed November 17, 2020 - Document 632), Defendants Teva Pharmaceuticals USA, Teva Pharmaceutical Industries Ltd., Actavis LLC, and Actavis Pharma, Inc. will take the deposition upon oral examination of Nellie Dawson, on **July 27, 2021 at 9:30 a.m. EDT at Greenberg Traurig LLP, 2101 L Street, N.W., Suite 1000, Washington, DC 20037**. The deposition shall be videotaped and recorded stenographically, and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case. The attorney contact for the deposition is:

Victoria J. Langton
Greenberg Traurig LLP
3333 Piedmont Road NE
Suite 2500
Atlanta, GA 30305
(678) 553-7392
langtont@gtlaw.com

Date: July 1, 2021

Respectfully submitted,

s/ Victoria J. Langton
Victoria J. Langton (GA Bar No. 444119)
GREENBERG TRAURIG, LLP
3333 Piedmont Road NE
Suite 2500
Atlanta, GA 30305
Tel: (678) 553-7392
Fax: (678) 553-2212
E-mail: langtont@gtlaw.com

*Attorney for Teva Pharmaceuticals USA, Inc.,
Teva Pharmaceutical Industries Ltd., Actavis
LLC, and Actavis Pharma, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of July, 2021, I caused a true and correct copy of the foregoing Notice of Videotaped Deposition of Nellie Dawson to be filed with the Court's ECF system and served upon counsel of record. I further certify that a copy of the foregoing was originally served on the following Plaintiff's counsel by e-mail, with copies by e-mail to Counsel for Defendants, on July 1, 2021:

Matthew Palmer Lambert, Esq. (counsel for Plaintiff Lana Dufrene)

Adam Slater, Esq. (via email, for distribution to Plaintiffs' Counsel)

Daniel A. Nigh, Esq. (via email)

Ruben Honik, Esq. (via email)

David Stanoch, Esq. (via email)

Conlee Whiteley, Esq. (via email)

Jessica Priselac, Esq. (via email)

Seth A. Goldberg, Esq. (via email)

Clem C. Trischler, Esq. (via email)

Sarah E. Johnston, Esq. (via email)

This 1st day of July, 2021.

s/ Victoria J. Langton

Victoria J. Langton (GA Bar No. 444119)

GREENBERG TRAURIG, LLP

3333 Piedmont Road NE

Suite 2500

Atlanta, GA 30305

Tel: (678) 553-7392

Fax: (678) 553-2212

E-mail: langtont@gtlaw.com

*Attorney for Teva Pharmaceuticals USA, Inc.,
Teva Pharmaceutical Industries Ltd., Actavis
LLC, and Actavis Pharma, Inc.*